

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

ATLAS KITCHENWARE & HARDWARE,
INC., d/b/a KARLIN-RICHTON COMPANY,

Plaintiff,

v.

QUICKIE MANUFACTURING
CORPORATION,

Defendant.

Civil Action No. 05-11779 NG

**JOINT MOTION TO CONTINUE
STATUS CONFERENCE AND TO AMEND SCHEDULING ORDER**

The Parties, by and through their undersigned counsel, jointly request that the Court continue the status conference currently scheduled for April 5, 2006 and extend the Scheduling Order deadlines as set forth below, so that the Parties may further engage in substantive settlement negotiations. In support of this motion, the Parties state that:

1. The initial Scheduling Conference in this matter was held on December 12, 2005.
2. The Parties have exchanged a significant amount of documentary evidence and discovery to date.
3. The Parties have expressed a mutual interest in further exploring a resolution to this matter before completing the final stages of discovery.
4. In an effort to more fully explore a resolution before incurring the additional expenditures necessitated by the current Scheduling Order, and completion of discovery, the Parties wish to extend the current deadlines as follows:
 - a) Status conference – to be set by the Court;

- b) Completion of discovery – May 31, 2006;
- c) Motions pertaining to discovery – June 16, 2006; and
- d) Dispositive motion deadline – July 14, 2006.

The Parties would be ready to commence trial September 18, 2006.

WHEREFORE, for the foregoing reasons, the Parties hereby respectfully request this Honorable Court to continue the status conference and extend the Scheduling Order deadlines to the dates set forth above.

Respectfully submitted,

ATLAS KITCHEN WARE &
HARDWARE, INC.
By Its Attorneys,

/s/ Zachary B. Mack

Respectfully submitted,

QUICKIE MANUFACTURING
CORPORATION
By Its Attorneys,

/s/ Scott E. Ross

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Dated: March 27, 2006